

Arent Fox

Via ECFS

March 29, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, DC 20554

Katherine E. Barker Marshall

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Re: CPNI Certification of Native American Telecom, LLC; EB Docket No. 06-36

Dear Ms. Dortch:

Attached please find, for filing, the CPNI compliance certification of Native American Telecom, LLC ("Native American"), which certifies that Native American is in compliance with 47 CFR §63.2001 *et seq.* Also included with this certification is a statement that outlines the procedures that Native American has in place with regards to the protection of CPNI.

Native American respectfully requests that the Commission waive the March 1, 2010 filing deadline, to the extent applicable, and accept Native American's CPNI compliance certification as timely filed. Native American only began offering service on the Crow Creek Indian Reservation in October 2009. At all times, Native American had procedures in place to ensure that CPNI, to the extent collected, is protected. Accordingly, the Commission's acceptance of this filing as timely will further the public interest and the Commission's goal of ensuring that companies have adequate procedures in places to ensure compliance with the Commission's CPNI requirements.

Thank you for your time and consideration. Please contact me at (202) 857-6104 if you have any questions or concerns regarding this filing.

Respectfully submitted,



Katherine E. Barker Marshall

cc: Best Copy and Printing, Inc. (via e-mail)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009.

1. Date filed: March 24, 2010
2. Name of company(s) covered by this certification: Native American Telecom, LLC
3. Form 499 Filer ID: Pending
4. Name of signatory: Gene DeJordy
5. Title of signatory: Chief Executive Officer
6. Certification:

I, Gene DeJordy, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Attachments: Accompanying Statement explaining CPNI procedures

Native American Telecom, LLC Statement of CPNI Operating Procedures

Native American Telecom, LLC ("Native American"). Native American began providing service at the end of 2009.

Native American has established policies and procedures to comply with the Federal Communications Commission's ("FCC's") rules regarding the use, disclosure, and access to §64.2001 *et seq.* of the Commission's rules, 47 C.F.R. §64.2001 *et seq.* These procedures ensure that Native American is in compliance with the FCC's customer proprietary network information ("CPNI") rules. This statement is a summary of Native American's policies and procedures designed to safeguard CPNI.

Native American has processes in place to control both physical security and access to data. Customers are provided services under contracts with express confidentiality provisions, verification methods to confirm the identity of customer's authorized persons to receive the customer's CPNI, and have dedicated account representative with access to customer data. Native American does maintain and utilize CPNI for the limited purposes of initiating, rendering, billing and collecting of its services, and may use CPNI, if necessary, to protect its property rights. Native American does not use any CPNI for any marketing purposes, nor does Native American disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Native American has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Native American has also implemented measures to discover and to protect against unauthorized attempts to access CPNI. Native American also has implemented procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation. Native American will notify its customers of the security breach, if permitted, and will notify of the breaches and notifications for a two-year period. Native American will track customer complaints regarding CPNI.

Native American will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.